REMARKS

Claims 1-16 are currently pending in the application.

Claims 1-3, 5-6, 8-11, and 13-15 stand rejected under 35 U.S.C. § 102(a), (e) as anticipated by U.S. Patent Application Publication No. 2002/0188666 by Lemon et al. Applicants traverse on the grounds that these claims are not anticipated by Lemon et al., as discussed below.

Claims 4, 7, 12, and 16 stand rejected under 35 U.S.C. § 103(a) as suggested by Lemon et al. in view of U.S. Patent Application Publication No. 2002/0059377 by Bandhole et al. Applicants traverse on the grounds that these claims are not suggested by Lemon et al. in view of Bandhole et al., as discussed below.

The Claimed Invention

The claimed invention provides a system and a method to extend application program interfaces to enable human users to interact with conversation-enabled applications. (Specification at 1, lines 14-17) The conversation support framework thus provided to support long-running human interactions may be implemented with various features, including, but not limited to, the following:

- Small footprint.
- Automatic generation of views to show messages received in the conversation and screen forms to solicit decision input from a user.
- Plug-and-play support for various on-wire message formats.
- Plug-and-play support for various incoming and outgoing messaging protocols.

(Specification at 4, lines 1-7) In addition, among other things, an archive format bundling conversation policies and message schemas may be employed according to the claimed invention. (Specification at 4, lines 9-10)

Rejection of Claims 1-3, 5-6, 8-11, and 13-15 Under 35 U.S.C. § 102(a), (e)

Claims 1-3, 5-6, 8-11, and 13-15 stand rejected under 35 U.S.C. § 102(a), (e) as anticipated by Lemon et al. Applicants traverse on the grounds that the rejected claims are not anticipated by Lemon et al. In brief, where the claimed invention enables human users to interact with conversation-enabled applications, as discussed above, the subject matter disclosed by Lemon et al. provides a mechanism for implementing a conversation between two services. (Lemon et al., paragraph [0011])

Claim 1. The Examiner erroneously reads paragraphs [0023], [0027], [0028], and [0034] of Lemon et al. as anticipating the following features of independent Claim 1:

- "[C]onversation support means communicating with a human-usable interface installed on a user device to support the user's side of a conversation with the conversation-enabled applications." (Claim 1, lines 4-6)
- "[P]resentation support means communicating with the human-usable interface installed on the user device to show the user a state of the conversation and options for selection by the user." (Claim 1, lines 7-9)
- "[D]ata input means installed on the user device by which the user selects an available option and fills in message content that conforms with the conversation policy in use by the conversation-enabled applications." (Claim 1, lines 10-12)

(Office Action at 3)

Regarding the requirement of Claim 1 (lines 4-6), "conversation support means communicating with a human-usable interface installed on a user device to support the user's side of a conversation with the conversation-enabled applications," the Office Action asserts that this requirement is anticipated by paragraph [0023] of Lemon et al., described in the Office Action as described in the Office Action as teaching that "a mechanism provides for a conversation controller," and by paragraph [0027] of Lemon et al., teaching to "validate that each message is of an appropriate input document type for

the current state of the conversation." (Office Action at 3) However, paragraphs [0023] and [0028] discuss conversation controllers (defined at paragraph [0026] of Lemon et al.) that handle messages on behalf of "services" (by which is meant "E-Services"; *see* paragraph [0021] of Lemon et al.) and do not discuss the "conversation-enabled applications" required by Claim 1.

Regarding the requirement of Claim 1 (lines 7-9), "presentation support means communicating with the human-usable interface installed on the user device to show the user a state of the conversation and options for selection by the user," the Office Action asserts that this requirement is anticipated by paragraph [0028] of Lemon et al., teaching "conversation history," and by paragraph [0034] of Lemon et al., teaching "prompting the client for valid input documents." However, paragraph [0028] discusses how a conversation controller may track the "state" of a conversation, while paragraph [0034] discusses how documents may be formatted in an appropriate format. Neither paragraph discusses how a "user device" may "show the user a state of the conversation and options for selection by the user," as required by Claim 1.

Regarding the requirement of Claim 1 (lines 10-12), "data input means installed on the user device by which the user selects an available option and fills in message content that conforms with the conversation policy in use by the conversation-enabled applications," the Office Action asserts that this requirement is anticipated by paragraph [0026] of Lemon et al., teaching "may also invoke appropriate services and/or client entry points based on dispatch service description language specifications and prompt for valid input document types for a given state of a conversation." However, paragraph [0026] of Lemon et al. simply defines a "conversation controller" as " a third party service that is capable of facilitating a conversation between two other services" and which "may act as a proxy to services and track the state of an ongoing conversion based on a conversation definition language specification" as well as "invoke appropriate service and/or client entry points . . . thus enabling the services and clients to engage in complex interactions with each other." (Lemon et al., paragraph [0026])

Paragraph [0026] does not permit a user to select an available option and fill in message content that conforms with the conversation policy in use by the conversation-enabled applications, as required by Claim 1.

Applicants respectfully submit that Claim 1 should be allowed.

Claim 2. The Examiner erroneously reads Figure 6 of Lemon et al. as anticipating the following feature of Claim 2: "wherein in the conversation support means and the presentation support means are installed on the user device." This is explained as attributable to the interpretation that Figure 6 of Lemon et al. "teaches wherein in the conversation support means are installed on the user device." (Office Action at 4) However, Figure 6 of Lemon et al. shows a computer running a web browser but does show a conversation support means installed thereon. Thus, Claim 2 should be allowed.

In addition, Claim 2 should be allowed as dependent from allowable Claim 1.

Claim 3. The Examiner erroneously reads Figure 3 of Lemon et al. as anticipating the following feature of Claim 3: "wherein the conversation support means and the presentation support means are installed on a remote machine which communicates with the user device." This is explained as attributable to the interpretation that Figure 3 of Lemon et al. "teaches wherein the conversation support means and the presentation support means are installed on a remote machine which communicates with the user device." (Office Action at 5) However, Figure 3 of Lemon et al. does not show conversation support or presentation support means installed on a remote machine, as required by Claim 3, but instead shows how a conversation controller manages messages from a client to a service. (Lemon et al., paragraph [0048], discussing Figure 3) Thus, Claim 3 should be allowed.

In addition, Claim 3 should be allowed as dependent from allowable Claim 1.

Claim 5. The Examiner erroneously reads paragraphs [0013] and [0052] of Lemon et al. as anticipating the following feature of Claim 5: "wherein the data input means prompts the user for decisions and then generates a corresponding screen flow for data input and transforms entered data into a format suitable for delivery to the remote

location." This is explained as based on the teachings of paragraphs [0013 and [0052] of Lemon et al. Paragraph [0013] of Lemon et al., however, provides for transforming output documents, such as into a hypertext markup language (HTML) format, while paragraph [0052] provides that "the conversation controller . . . may return the message back to the client . . . and prompt for next legal input document." Those paragraphs do not provide means for prompting a user for decisions, generates a corresponding screen flow for data input based on the user input, and transforming entered data into a format suitable for delivery to the remote location, as required by Claim 5. Thus, Claim 5 should be allowed.

In addition, Claim 5 should be allowed as dependent from allowable Claim 1.

Claim 6. The Examiner erroneously reads paragraphs [0028] and [0052] of Lemon et al. as anticipating the following feature of Claim 6: "wherein said presentation support means includes an archive of presentation policies accessed to render messages for the user." This is explained as attributable to paragraph [0028] teaching "current sate, may need to be tracked." (Office Action at 5) However, paragraph [0028] discusses how a conversation controller may track the "state" of a conversation, while paragraph [0052] provides that "the conversation controller . . . may return the message back to the client . . . and prompt for next legal input document." Neither paragraph provides a presentation support means that includes an archive of presentation policies accessed to render messages for a user, as required by Claim 6. Thus, Claim 6 should be allowed.

In addition, Claim 6 should be allowed as dependent from allowable Claim 1.

Claim 8. The Examiner erroneously reads Figure 6 of Lemon et al. as anticipating the following feature of Claim 8: "wherein the user device is a personal computer." This is explained as attributable to the interpretation that Figure 6 of Lemon et al. "further teaches wherein the user device is a personal computer." (Office Action at 5) However, while Figure 6 of Lemon et al. shows a computer, the disclosure of Lemon et al. does not anticipate every possible invention in connection with which a computer may serve as a user device. Thus, Claim 8 should be allowed.

In addition, Claim 8 should be allowed as dependent from allowable Claim 1.

Claim 9. The Examiner erroneously reads Figure 3 of Lemon et al. as anticipating the following feature of Claim 9: "wherein said presentation support is obtained from another system." This is explained as attributable to the interpretation that Figure 3 of Lemon et al. "further teaches wherein said presentation support is obtained from another system." (Office Action at 5) However,However, Figure 3 of Lemon et al. does not show presentation support being obtained from another system, as required by Claim 9, but instead shows how a conversation controller manages messages from a client to a service. (Lemon et al., paragraph [0048], discussing Figure 3) Thus, Claim 9 should be allowed.

In addition, Claim 9 should be allowed as dependent from allowable Claim 1.

Claim 10. The Examiner erroneously reads paragraphs [0023], [0027], [0028], [0034], [0056], and [0057] of Lemon et al. as anticipating the following features of independent Claim 1:

- "[L]oading a selected service device, said service including a policy archive and a presentation archive." (Claim 10, lines 4-6)
- "[I]nstalling a conversation policy supporting the selected service." (Claim 10, line 7)
- "[A]ccessing the policy archive and communicating with the human-usable interface installed on the user device to support the user's side of a conversation with the conversation-enabled applications." (Claim 10, lines 8-10)
- "[A]ccessing the presentation archive and communicating with the human-usable interface installed on the user device to show the user a state of the conversation and options for selection by the user." (Claim 10, lines 11-13)
- "[P]rompting user to select an available option and fill in message content that conforms with the conversation policy in use by the

conversation-enabled applications." (Claim 10, lines 14-15) (Office Action at 3)

Regarding the requirement of Claim 10 (lines 5-6), "loading a selected service device, said service including a policy archive and a presentation archive," the Office Action asserts that this requirement is anticipated by paragraph [0056] of Lemon et al., described in the Office Action as described in the Office Action as teaching that "may execute information . . . received from the Internet or other networks," and by paragraph [0057] of Lemon et al., described as teaching "these aspects of an implementation consistent with the rpesent invnetion are described as being stored in memory . . . or read from other types." (Office Action at 3-4) However, paragraphs [0056] and [0057] discuss the use of a computer in the preferred embodiment of the subject matter disclosed by Lemon et al. and do not discuss "loading a selected service device" or "including a policy archive and a presentation archive" as required by Claim 10.

Regarding the requirement of Claim 10 (line 7), "installing a conversation policy supporting the selected service," the Office Action asserts that this requirement is anticipated by paragraph [0023] of Lemon et al., described in the Office Action as described in the Office Action as teaching that "a mechanism provides for a conversation controller." (Office Action at 3) However, paragraph [0023] discusses the advantages of providing "a conversation controller that enables services to carry out an entire conversation without the service developers having to implement code to manage conversation logic" (the term "services" being understood to be limited to "E-Service"; *see* paragraph [0021]) and does not install a conversation policy supporting a selected service, as required by Claim 10.

Regarding the requirement of Claim 10 (lines 8-10), "accessing the policy archive and communicating with the human-usable interface installed on the user device to support the user's side of a conversation with the conversation-enabled applications," the Office Action asserts that this requirement is anticipated by paragraph [0027] of Lemon et

al., teaching to "validate that each mesage is of an appropriate input document type for the current state of the conversation." (Office Action at 3) However, paragraph [0027] discussed the validation of messages and the optional filtering of prompts by document type. Paragraph [0027] does not access a policy archive and communicate with a human-usable interface installed on a user device to support the user's side of a conversation with conversation-enabled applications, as required by Claim 10.

Regarding the requirement of Claim 10 (lines 11-13), "accessing the presentation archive and communicating with the human-usable interface installed on the user device to show the user a state of the conversation and options for selection by the user," the Office Action asserts that this requirement is anticipated by paragraph [0028] of Lemon et al., teaching "conversation history," and by paragraph [0034] of Lemon et al., teaching "prompting the client for valid input documents." However, paragraph [0028] discusses how a conversation controller may track the "state" of a conversation, while paragraph [0034] discusses how documents may be formatted in an appropriate format. Neither paragraph discusses how a "user device" may "show the user a state of the conversation and options for selection by the user," as required by Claim 10.

Regarding the requirement of Claim 10 (lines 14-15), "prompting user to select an available option and fill in message content that conforms with the conversation policy in use by the conversation-enabled applications," the Office Action asserts that this requirement is anticipated by paragraph [0026] of Lemon et al., teaching "may also invoke appropriate services and/or client entry points based on dispatch service description language specifications and prompt for valid input document types for a given state of a conversation." However, paragraph [0026] of Lemon et al. simply defines a "conversation controller" as " a third party service that is capable of facilitating a conversation between two other services" and which "may act as a proxy to services and track the state of an ongoing conversion based on a conversation definition language specification" as well as "invoke appropriate service and/or client entry points . . . thus enabling the services and clients to engage in complex interactions with each other."

(Lemon et al., paragraph [0026]) Paragraph [0026] does not permit a user to select an available option and fill in message content that conforms with the conversation policy in use by the conversation-enabled applications, as required by Claim 10.

Applicants respectfully submit that Claim 10 should be allowed.

Claim 11. The rejection of Claim 11 is derivative of the rejection of Claim 2. As a result, the foregoing discussion of Claim 2 is incorporated by reference as if fully restated herein to show that Claim 11 should be allowed.

In addition, Claim 11 should be allowed as dependent from allowable Claim 10.

Claim 13. The rejection of Claim 13 is derivative of the rejection of Claim 8. As a result, the foregoing discussion of Claim 8 is incorporated by reference as if fully restated herein to show that Claim 13 should be allowed.

In addition, Claim 13 should be allowed as dependent from allowable Claim 11.

Claim 14. The rejection of Claim 14 is derivative of the rejection of Claim 3. As a result, the foregoing discussion of Claim 3 is incorporated by reference as if fully restated herein to show that Claim 14 should be allowed.

In addition, Claim 14 should be allowed as dependent from allowable Claim 10.

Claim 15. The rejection of Claim 15 is derivative of the rejection of Claim 9. As a result, the foregoing discussion of Claim 9 is incorporated by reference as if fully restated herein to show that Claim 15 should be allowed.

In addition, Claim 15 should be allowed as dependent from allowable Claim 10.

Rejection of Claims 4, 7, 12, and 16 Under 35 U.S.C. § 103(a)

Claims 4, 7, 12, and 16 stand rejected under 35 U.S.C. § 103(a) as suggested by Lemon et al. in view of U.S. Patent Application No. 2002/0059377 by Bandhole et al. Applicants traverse on the grounds that the rejected claims are not suggested by Lemon et al. in view of Bandhole et al. As previously noted, where the claimed invention enables human users to interact with conversation-enabled applications, the subject matter disclosed by Lemon et al. provides a mechanism for implementing a conversation between two services. (Lemon et al., paragraph [0011]) Bandhole et al. provide a system

and method for collaborative computing which:

- Allocates resources of a dynamic computing environment through a first user interface.
- Shares at least one resource between the first user interface and a second user interface.
- Executes an application on at least one allocated resource using either the first or second user interface.
- Transfers information generated by executing the application to the first user interface.
- Transfers, in response to a command to collaborate with the second user interface, the information generated by executing the application to the second user interface.

(Bandhole et al., paragraph [0023]) Thus, a combination of Lemon et al. with Bandhole et al. does not result in or suggest the claimed invention.

Claim 4. The Examiner has erroneously found the following feature of Claim 4 to be anticipated by Lemon et al. in view of Bandhole et al.: "wherein the human-usable interface is a plugin browser." Recognizing that Lemon et al. do not anticipate Claim 4, the Office Action calls on paragraph [0043] of Bandhole et al. to make up for the deficiency. (Office Action at 6) That paragraph, however, simply provides that a software process employed in conjuction with the subject matter disclosed by Bandhole et al. "can be any type of application program, applet, operating system, plug-in, user-interface controller, or other process." Bandhole et al. do not suggest every possible invention that employs software plug-ins. Neither Lemon et al. nor Bandhole et al. suggest that a human-usable interface installed on a user device to support the user's side of a conversation with conversation-enabled applications, as in base Claims 1 and 10 (discussed above), may be implemented as a plug-in, as required by Claim 4. The statement that "[o]ne of ordinary skill in the art knows that plug-in's are employed from the Internet for enabling specific functional applications via a browser" (Office Action

at 7) constitutes impermissible hindsight as well as an improper assertion of technical fact in an area of esoteric technology without support by citation of any reference work. *See* M.P.E.P. § 2144.03, citing *In re Ahlert*, 424 F.2d 1088, 1091, 165 U.S.P.Q. 418, 422-21 (C.C.P.A. 1970).

In addition, Claim 4 should be allowed as dependent from allowable Claim 1.

Claim 7. The Examiner has erroneously found the following feature of Claim 7 to be anticipated by Lemon et al. in view of Bandhole et al.: "wherein the user device is a personal digital assistant." Recognizing that Lemon et al. do not anticipate Claim 7, the Office Action calls on paragraphs [0030] and [0041] of Bandhole et al. to make up for the deficiency. (Office Action at 7) Those paragraph, however, simply provide for the use of a personal digital assistant in connection with the subject matter disclosed by Bandole et al. However, simply because Bandhole et al. foresee the use of personal digital assistants in connection with the subject matter of their disclosure, it does not follow that every possible invention capable of being implemented with a personal digital assitant is suggested by Bandhole et al. Neither Lemon et al. nor Bandhole et al. suggest that a user device supporting the user's side of a conversation with conversation-enabled applications, as in base Claims 1 and 10 (discussed above), may be embodied in a personal digital assistant, as required by Claim 7.

In addition, Claim 7 should be allowed as dependent from allowable Claim 1.

Claim 12. The rejection of Claim 12 is derivative of the rejection of Claim 7. As a result, the foregoing discussion of Claim 7 is incorporated by reference as if fully restated herein to show that Claim 12 should be allowed.

In addition, Claim 12 should be allowed as dependent from allowable Claim 11.

Claim 16. The rejection of Claim 16 is derivative of the rejection of Claim 4. As a result, the foregoing discussion of Claim 4 is incorporated by reference as if fully restated herein to show that Claim 16 should be allowed.

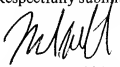
In addition, Claim 16 should be allowed as dependent from allowable Claim 10.

Conclusion

In view of the foregoing, Applicants submit that Claims 1-20 are in condition for allowance. The Examiner is respectfully requested to pass the above application to issue. The Examiner is invited to contact the undersigned at the telephone number listed below, if needed.

Applicants hereby make a written conditional petition for extension of time, if required. Please charge any deficiencies in fees and credit any overpayment of fees to Applicants' Deposit Account No. 50-0510 (IBM Corporation).

Respectfully submitted,



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